

From: <Reynolds.Peggy@epamail.epa.gov>
To: R3PA1.R3RCRA(CREAMER-CHARLENE)
Date: 3/27/00 3:32pm
Subject: Re: Navy meeting -Forwarded -Reply

Charlene. Thanks; it's beginning to make a little more sense to me. I forwarded your "background" e-mail to both John and Tony. In the interim Lillian had contacted Tony and he "accepted" the meeting (since my boss accepted the meeting, so did I), but this is really a Tony Baney/John Smith meeting.

I believe John has gotten a couple of calls re: "torching" PCB coated metal. And the answer has been a resounding, "NO, don't do that!" I don't think this meeting will change anything. Besides, if memory serves me correctly, it was the Navy that suggested use of the NACE standards (see 761.79(b)(3)(i)(B) for unrestricted use and .79(b)(3)(ii)(B) for disposal in a smelter)) which I think are sand blasting standards.

From: <Baney.Tony@epamail.epa.gov>
To: RTPMAINHUB.INTERNET(REYNOLDS-PEGGY)
Date: 3/28/00 7:17am
Subject: Re: Navy meeting -Forwarded -Reply

Well, this looks like forum shopping. The Navy and the scrapping contractors have already been apprised of our position on this issue. My guess is that this is Pam and Tom just stirring the pot to revisit the issue.

Peggy Reynolds
03/27/2000 03:20 PM

To: Tony Baney/DC/USEPA/US@EPA, JohnH Smith/DC/USEPA/US@EPA
cc:

Subject: Re: Navy meeting -Forwarded -Reply

It seemed to me that several people in Region III were trying to set up a meeting. I asked Charlene for background. Please see the following e-mail.

----- Forwarded by Peggy Reynolds/DC/USEPA/US on 03/27/2000
03:21 PM -----

Charlene Creamer@EPA on 03/27/2000 03:07:06 PM

To: Peggy Reynolds/DC/USEPA/US@EPA
cc:

Subject: Re: Navy meeting -Forwarded -Reply

Hi Peggy!

I'll try and fill in some of the blanks.

The USN requested this meeting and it is based on the ship scrapping issues in general. For some background, I received a call from a "contractor" who needed some information re: "cutting large pieces of metal, using torch cutting, into smaller ones for disposal that may have a PCB (above 50 ppm) coating." This gentleman did not identify himself as being connected with the ship scrapping operations.

I told him at first glance of the issue, that a possible concern would be dioxin formation, but that I would check into the issue with HQ. I spoke with Tom S. at the time (via exchange of voice mail messages) and he said that there may/was the possibility of dioxin formation and

he would give me a regulation citation for that (I still don't have a citation because we were still exchanging voice mail messages).

I did relay that information to the "contractor" and found out later that the "contractor" was working on the ship scrapping operations. So, I guess he relayed it to the USN and now they would like a meeting. We (Aquanetta and I) spoke with the Navy on Friday (3/24/00) and they really want a meeting. I did suggest that if torch cutting was the only possible way to cut the metal, was then to possibly decon above and below the cut line and then use torch cutting, but he said they didn't want to do that. So, they really want a meeting.

If you can shed any light on this issue from previous discussions, or if there is an "agreement" for this situation, I would really appreciate it. Maybe, there won't be a need to conduct a meeting with the Navy re: torch cutting...

FYI: Lillian is our Branch's secretary (Aquanetta had her set up the meeting), HQ can definitely be conferenced in via telephone, John Ruggero is with the Office of Regional Counsel, who I guess is assigned to this issue, and the questions he had are in preparation for this meeting.

I hope this answers your questions. If anything else comes up, please call or send an e-mail. Thanks for your help!

Char
215/814-2145

>>> <Reynolds.Peggy@epamail.epa.gov>
03/27/00 01:25pm >>>

Charlene: I've seen the various notices re: Navy meeting, but don't know if Baney has responded (I'm still trying to get the 2 things I was working on Thursday off my desk) and Smith is not in the office until Tuesday.

Who is Lillian Andrelczyk; does she work with John Ruggero? Can the folks at HQs be connected by phone for the 4/5 meeting? Tony reminded me that EPA/Navy have discussed these issues; i.e., during interagency review of the Disposal Amendments, so he doesn't see the need for

people here to spend travel \$\$ for a trip to Phila or to spend 3 hours in a meeting. Can you feel in the blanks; who requested this meeting, is the meeting relevant to the USS NJ, or scrapping issues in general? Is the meeting John wants to have in preparation for the 4/5 meeting? Etc.

I'll nudge Tony when I get some background info on these meetings.

CC: R3PA1.R3RCRA(CREAMER-CHARLENE),RTPMAINHUB.INTERNET...

From: <Casey.Laura@epamail.epa.gov>
To: RTPMAINHUB.INTERNET(BANEY-TONY)
Date: 3/28/00 7:32am
Subject: Re: Navy meeting -Forwarded -Reply

Good Morning

I do not know if this is or was a related issue but on or about 3/9, I spoke with a Hugh Peck from Baltimore Marine. They are conducting the Ship Scrapping Pilot Program at Sparrows Pt in Dundalk MD. Mr. Peck is an Env. Engineer for the project. He called me about proper disposal/decon for high grade aluminum coated with PCB paint (53-74 ppm). He indicated the metal was being cold cut. Maybe this only applies to aluminum, I don't know enough about the scrapping process.

Also, I believe the subject of cutting metal with a torch was addressed in a letter to a Navy Contractor about a year and half ago.

Hope some of this is useful.

Laura Casey

CC: R3PA1.R3RCRA(CREAMER-CHARLENE),RTPMAINHUB.INTERNET...